

EXHIBIT M

DECLARATION OF MADELEINE LAMARRE, MN, FNP-BC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

MICHAEL AMOS, PITRELL BRISTER,
ANTONIO DAVIS, WILLIE FRIEND, CHARLES
GAYLES, DANIEL GUTHRIE, JONATHAN J.
HAM, DESMOND HARDY, BILLY JAMES, JR.,
JUSTIN JAMES, QUENTEN JOHNSON,
DEAUNTE LEWIS, LARRY MAXWELL,
TERRANCE MCKINNEY, DERRICK PAN,
BRANDON ROBERTSON, KURIAKI RILEY,
DERRICK ROGERS, TYREE ROSS, H.D.
ALEXANDER SCOTT, DEANGELO TAYLOR,
LEMARTINE TAYLOR, CONTI TILLIS,
DEMARCUS TIMMONS, CARLOS VARNADO,
PHILLIP DECARLOS WEBSTER, ADRIAN
WILLARD, CURTIS WILSON, CALEB
BUCKNER, WILLIAM GREEN, ARIC
JOHNSON, IVERY MOORE, and KEVIN
THOMAS, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

TOMMY TAYLOR, in his official capacity as the
Interim Commissioner of the Mississippi
Department of Corrections, and MARSHAL
TURNER, in his official capacity as the
Superintendent of the Mississippi State
Penitentiary,

Defendants.

Case No. 4:20-CV-007-DMB-JMV

DECLARATION OF MADELEINE LAMARRE, MN, FNP-BC

On this 31st day of January, 2020, I hereby declare:

1. My name is Madeleine LaMarre, and I currently live in Atlanta, Georgia.
2. I am a family nurse practitioner with over 35 years in correctional health care.
3. I worked for the Georgia Department of Corrections for 20 years and was responsible for a clinical monitoring process to evaluate health care systems and the quality of health care in the Georgia prison system. In 2002 I was appointed by Judge Thelton Henderson

to be a medical expert in *Plata v. Newsome*, monitoring health care at the California Department of Corrections.

4. I have performed investigations and monitored settlements in over 100 prisons around the country. In addition, I have performed investigations and/or monitored settlement agreements in Ohio, Delaware and Mississippi. Specifically I have conducted site visits at Mississippi State Prison at Parchman, East Mississippi Correctional Facility, South Mississippi Correctional Facility, Wilkinson County Correctional Facility and Walnut Grove Correctional Facility. I have never been involved in a security-related incident or breach throughout my time investigating and inspecting prisons.

5. I am generally familiar with custody policies and procedures regarding safety and respect correctional personnel's need to provide a safe environment. Prior to my inspections in this matter, I commit to notify administrators and my assigned escorts that I am comfortable in the correctional environment but should they have any concern during the tour, to immediately let me know and I will obey their direction.

6. I am familiar with the above encaptioned matter including but not limited to reviewing the complaint, motion for emergency relief and exhibits thereto, all responsive pleadings, inmate affirmations, photos, videos, and other evidence of the prison conditions.

7. As part of my inspection, I require the ability to perform the following actions at the Parchman facility Units 29, 30, 32, and 42:

- a) Tour and inspect medical clinics and infirmaries;
- b) Tour the housing units, including segregation, and inspect: call lights for functionality, lockable sick call boxes and sick call request forms, and emergency equipment and inspection logs;

- c) Speak confidentially to inmates in each housing unit, medical clinics and infirmary, and review those inmates' full medical records file;
 - d) Observe medication administration in general population, segregation, and medical housing or infirmary, in the morning and evening; and
 - e) Review current health care systems policy and procedure manual(s).
8. I will require approximately four days to perform the actions necessary for a thorough preliminary. I will work in conjunction with Dr. Marc Stern to minimize stress of Parchman resources.
9. Finally, I have reviewed Eldon Vail's declaration dated January 31, 2010, and I concur with his statements.
10. I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 31, 2020.



Madeleine LaMarre, MN, FNP-BC